



4503 North Front Street
Harrisburg, PA 17110
P: 717.525.9124 F: 717.525.9143
www.victimscivilattorneys.com

Benjamin D. Andreozzi, Esq.
(admitted in PA, NY, NJ, AZ)

Nathaniel L. Foote, Esq.
(admitted in PA, NY, NJ)

Veronica N. Hubbard, Esq.
(admitted in PA)

Renee E. Franchi, Esq.
(admitted in PA, MD, CO)

June 10, 2024

Via Email Only [magistrate_judge_arbuckle@pamd.uscourts.gov]

Magistrate Judge William I. Arbuckle
U.S. District Court
Middle District of Pennsylvania
U.S. Courthouse and Federal Office Building
240 West Third Street
Suite 218
Williamsport, PA 17701

**Re: Joint letter to Honorable Judge Arbuckle
4:23-cv-01566-WIA A.M.M. v. Adelphoi Services Inc., et al**

Dear Honorable Judge Arbuckle:

We are writing to you to inquire about the status of the *Protective Order and Joint CA, Doc. 17, filed February 29, 2-24*. We are in the process of exchanging discovery, however, much of that information must remain confidential. We circulated a joint protective order for your Honor's approval. We do not believe it has yet been approved. Once a protective order has been approved, we may continue exchanging confidential discovery information.

The parties would be in agreement to hold a brief phone conference with your Honor to discuss, if necessary. Thank you for your time and attention to this matter.

Respectfully,

/s/ Renee E. Franchi

Renee E. Franchi, Esquire

REF/mys

cc: Gerard J. Geiger, Esquire (via email only)
Edward J. Henry, Esquire (via email only)